

Partners Dawn M. Cardi Chad L. Edgar

Associates Jessica Friedrich Joanna C. Kahan

> Of counsel Nina Epstein Diane Ferrone

May 4, 2021

BY ECF

Honorable Naomi Reice Buchwald United Stated District Judge Southern District of New York Daniel Patrick Moynihan **United States Courthouse** 500 Pearl Street New York, NY 10007

> Re: United States v. Elkorany, 20 Cr. 437 (NRB)

Dear Judge Buchwald:

We represent Mr. Karim Elkorany in the above-captioned proceeding. We write to request a modification of the pending briefing schedule for pretrial motions. Currently, defense counsel is scheduled to file its initial pre-trials motions by May 10, 2021, the government is to file its opposition by June 10, 2021 and defense counsel is to file its reply by July 1, 2021. Due to certain scheduling and workflow issues, defense seeks permission to file its pre-trial motions by May 17, 2021. Under the modified schedule, the government would have an additional week to file its opposition, i.e., by June 17, 2021 and defense counsel would file its reply by the same date as currently contemplated – July 1, 2021. This is the first request by defense counsel to modify the briefing schedule for pretrial motions and the government does not oppose the application.

We thank the court in advance for its consideration of this request.

Respectfully submitted,

/s/

Application granted.

NAOMI REICE BUCHWALD UNITED STATES DISTRICT JUDGE

SO ORDERED.

Dawn M. Cardi Chad L. Edgar

Dated:

New York, N.Y.

May 5, 2021

AUSA Daniel Richenthal cc: AUSA Lara Pomerantz **AUSA Robert Sobelman**

AUSA Amanda Houle (all by ECF)